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9  
10 **BEFORE THE**  
**BOARD OF REGISTERED NURSING**  
**DEPARTMENT OF CONSUMER AFFAIRS**  
11 **STATE OF CALIFORNIA**

12  
13 In the Matter of the Accusation Against:

Case No.

2010-484

14 **LORI TROWBRIDGE, aka**  
**LORI ANNE TROWBRIDGE, aka**  
15 **LORI ANNE GODDARD**  
11054 Glenn Meadow Drive  
16 Grass Valley, CA 95945

**A C C U S A T I O N**

17 **Registered Nurse License No. 468488**

18 Respondent.

19  
20 Complainant alleges:

21 **PARTIES**

22 1. Louise R. Bailey, M.Ed., RN ("Complainant") brings this Accusation solely in her  
23 official capacity as the Interim Executive Officer of the Board of Registered Nursing, Department  
24 of Consumer Affairs.

25 **License History**

26 2. On or about August 31, 1991, the Board of Registered Nursing issued Registered  
27 Nurse License Number 468488 to Lori Trowbridge, Lori Anne Trowbridge, and Lori Anne  
28

1 Goddard ("Respondent"). The license was in full force and effect at all times relevant to the  
2 charges brought herein and will expire on March 31, 2011, unless renewed.

### 3 JURISDICTION

4 3. This Accusation is brought before the Board of Registered Nursing ("Board"),  
5 Department of Consumer Affairs, under the authority of the following laws. All section  
6 references are to the Business and Professions Code ("Code"), unless otherwise indicated.

7 4. Code section 2750 provides, in pertinent part, that the Board may discipline any  
8 licensee, including a licensee holding a temporary or an inactive license, for any reason provided  
9 in Article 3 (commencing with section 2750) of the Nursing Practice Act.

10 5. Code section 2764 provides, in pertinent part, that the expiration of a license shall not  
11 deprive the Board of jurisdiction to proceed with a disciplinary proceeding against the licensee or  
12 to render a decision imposing discipline on the license.

13 6. Code section 118, subdivision (b), provides that the suspension, expiration, or  
14 cancellation of a license shall not deprive the Board of jurisdiction to proceed with a disciplinary  
15 action during the period within which the license may be renewed, restored, reissued or

### 16 STATUTORY PROVISIONS

17 7. Code section 2761 states, in pertinent part:

18 The board may take disciplinary action against a certified or licensed  
19 nurse or deny an application for a certificate or license for any of the following:

20 (a) Unprofessional conduct, . . . .

21 8. Code section 2762 states, in pertinent part:

22 In addition to other acts constituting unprofessional conduct within the  
23 meaning of this chapter [the Nursing Practice Act], it is unprofessional conduct  
for a person licensed under this chapter to do any of the following:

24 (a) Obtain or possess in violation of law, or prescribe, or except as  
25 directed by a licensed physician and surgeon, dentist, or podiatrist administer to  
26 himself or herself, or furnish or administer to another, any controlled substance  
as defined in Division 10 (commencing with Section 11000) of the Health and  
27 Safety Code or any dangerous drug or dangerous device as defined in Section  
4022.

28 (b) Use any controlled substance as defined in Division 10 (commencing  
with Section 11000) of the Health and Safety Code, or any dangerous drug or

1 dangerous device as defined in Section 4022, or alcoholic beverages, to an  
2 extent or in a manner dangerous or injurious to himself or herself, any other  
3 person, or the public or to the extent that such use impairs his or her ability to  
4 conduct with safety to the public the practice authorized by his or her license.

5 (e) Falsify, or make grossly incorrect, grossly inconsistent, or  
6 unintelligible entries in any hospital, patient, or other record pertaining to the  
7 substances described in subdivision (a) of this section.

8 9. Health and Safety Code Section 11173, subdivision (a), provides that no person shall  
9 obtain or attempt to obtain controlled substances, or procure or attempt to procure the  
10 administration of or prescription for controlled substances, (1) by fraud, deceit, misrepresentation,  
11 or subterfuge; or (2) by the concealment of a material fact.

#### 12 COST RECOVERY

13 10. Code section 125.3 provides, in pertinent part, that the Board may request the  
14 administrative law judge to direct a licentiate found to have committed a violation or violations of  
15 the licensing act to pay a sum not to exceed the reasonable costs of the investigation and  
16 enforcement of the case.

#### 17 11. DRUG

18 "Vicodin," a compound consisting of 5 mg. Hydrocodone Bitartrate, also known as  
19 Dihydrocodeinone, and 500 mg Acetaminophen per tablet, is a Schedule III controlled substance  
20 as designated by Health and Safety Code section 11056, subdivision (e)(4).

#### 21 FIRST CAUSE FOR DISCIPLINE

##### 22 (Diversion of Controlled Substances)

23 12. Respondent is subject to disciplinary action pursuant to Code section 2761,  
24 subdivision (a), on the grounds of unprofessional conduct, as defined by Code section 2762,  
25 subdivision (a), in that between April 2004, and December 2004, while working as a registered  
26 nurse in the Emergency Room at Sutter Auburn Faith Hospital in Auburn, California, Respondent  
27 committed the following acts:

28 a. Respondent obtained Vicodin, a controlled substance, by fraud, deceit,  
misrepresentation, or subterfuge, or by a concealment of material fact, by obtaining the drugs

1 from hospital supplies in violation of Health and Safety Code section 11173, subdivision (a), as  
2 further set forth below in paragraph 14.

3 **SECOND CAUSE FOR DISCIPLINE**

4 **(Use of Controlled Substances)**

5 13. Respondent is subject to disciplinary action pursuant to Code section 2761,  
6 subdivision (a), on the grounds of unprofessional conduct, as defined by Code section 2762,  
7 subdivision (b), in that between April 2004, and December 2004, while working as a registered  
8 nurse in the Emergency Room at Sutter Auburn Faith Hospital in Auburn, California, Respondent  
9 committed the following acts:

10 a. Between April 2004 and December 2004, Respondent admitted that she self-  
11 administered unknown quantities of Vicodin, a controlled substance, without lawful authority.

12 **THIRD CAUSE FOR DISCIPLINE**

13 **(Incorrect and/or Inconsistent Entries in Hospital and/or Patient Records)**

14 14. Respondent is subject to disciplinary action under Code section 2761, subdivision  
15 (a), on the grounds of unprofessional conduct, as defined in Code section 2762, subdivision (e), in  
16 that between April 2004, and December 2004, while employed at Sutter Auburn Faith Hospital in  
17 Auburn, California, Respondent made grossly incorrect or grossly inconsistent entries in hospital  
18 and/or patient records. Respondent withdrew controlled substances from the hospital's Pyxis  
19 machine and failed to chart the administration of the drugs in the patient's Medical  
20 Administration Record, or otherwise account for the wastage, or disposition of the drugs, as more  
21 particularly set forth below:

22 **Patient A**

23 a. On April 18, 2004, at 2049 hours, Respondent withdrew one Vicodin (Hydrocodone  
24 APAP 5/500) tablet from the Pyxis machine for this patient. Respondent failed to chart the  
25 administration of the drug in the patient's Medication Administration Record or nursing notes or  
26 otherwise account for the wastage or disposition of the drug in any hospital record.

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1        Patient B

2        b.     On June 4, 2004, at 2053 and 2115 hours Respondent withdrew eight Vicodin  
3 (Hydrocodone APAP 5/500) tablets from the Pyxis machine for this patient. Respondent failed to  
4 chart the administration of the drug in the patient's Medication Administration Record or nursing  
5 notes or otherwise account for the wastage or disposition of the drug in any hospital record.

6        Patient C

7        c.     On December 28, 2004, at 1526 hours, Respondent withdrew two Vicodin  
8 (Hydrocodone APAP 5/500) tablets from the Pyxis machine for this patient. Respondent failed to  
9 chart the administration of the drug in the patient's Medication Administration Record or nursing  
10 notes or otherwise account for the wastage or disposition in any hospital record.

11                                PRAYER

12        WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged,  
13 and that following the hearing, the Board of Registered Nursing issue a decision:

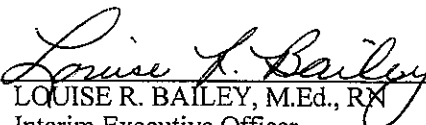
14        1.     Revoking or suspending Registered Nurse License Number 468488 issued to Lori  
15 Trowbridge, Lori Anne Trowbridge and Lori Anne Goddard;

16        2.     Ordering Lori Trowbridge, Lori Anne Trowbridge, and Lori Anne Goddard, to pay  
17 the Board the reasonable costs of the investigation and enforcement of this case, pursuant to Code  
18 section 125.3; and,

19        3.     Taking such other and further action as deemed necessary and proper.

20  
21        DATED: \_\_\_\_\_

3/30/10

  
LOUISE R. BAILEY, M.Ed., RN  
Interim Executive Officer  
Board of Registered Nursing  
Department of Consumer Affairs  
State of California  
Complainant

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